



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
 DIVISION OF HAZARDOUS WASTE MANAGEMENT
LANCE R. MILLER, DIRECTOR
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. P 905-518-356

24 MAY 1991

Cris Anderson, Manager
 Environmental Affairs
 L.E. Carpenter Company
 1301 E. Ninth Street, Suite 3600
 Cleveland, OH 44114

Dear Mr. Anderson:

Re: L.E. Carpenter ACO dated September 26, 1986
 Extent of Off-site Contaminant Migration

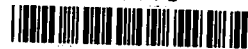
The New Jersey Department of Environmental Protection (Department) considers that there is a strong possibility that contamination from the L.E. Carpenter site has migrated onto adjacent properties and deems that the nature and extent of such contamination must be investigated to a reasonable degree to assure the protection of public welfare and the environment. To this end the Department is requiring that additional monitoring wells be installed on the adjacent properties of Wharton Enterprises, Inc. and Air Products and Chemicals, Inc. (AP).

The location of one of these additional monitoring wells (MW-21) on the property of Wharton Enterprises has been selected and is shown on a modified map labelled AREAS OF CONCERN, dated June 11, 1990. (MW-21 is shown approximately 200 ft. East-Southeast of existing MW-14.)

The location of additional monitoring wells on AP property is not indicated. A well should be located northeast of existing monitoring well MW-13, at a distance sufficient to be in the domain of regional flow.

The Department's reasoning for these additional wells is as follows:

The area east of the LEC buildings 13 and 14 was lowlands prior to the filling-in of the AP property and of the formation of a definite drainage ditch that separate the two properties. This lowland area is evident in 1961 aerial photos of the site; also clearly seen on the photo is the LEC impoundment South-Southeast of the tank farm and a short distance



from the lowlands. It is believed that waste liquids from this impoundment infiltrated into the water table and migrated into the lowlands, under gradients similar to those identified in current hydrogeologic isopliths of the site. It is presumed that, since the clearly-cut ditch did not exist before the AP site was developed, the liquids migrated from the impoundment into the groundwater and in all downgradient directions, i.e., toward the Rockaway River and toward what is now AP property. See RI Shallow Well Map, Figure 16 (June 11, 1990). The mixture of liquid wastes and sludges in the impoundment were identified in 1979-1980 as containing the contaminants predominantly VO's and B/N's but the mixture also contained chlorinated hydrocarbons, small amounts of which were found in samples from MW-13s (on AP property) in 1989-1990.

It is the Department's belief that LEC contaminants migrated to the AP site before the drainage ditch was dug and that the full areal extent of migration of contaminants has not been established. It is also the Department's belief that the ditch is not a fully penetrating hydraulic barrier and that groundwater from LEC can still migrate under it to the AP site. (The RI shallow well Map referenced above corroborates that the groundwater gradient is currently in a southeasterly direction and leads onto AP property.)

Therefore, since the direction of regional groundwater movement on AP property is not confirmed and that the ground water level in MW-13 may only be representative of direction of the subsurface water in the vicinity of the ditch, water level measurements in an additional well on AP's site will help determine direction of shallow groundwater flow.

The Department is also concerned that ground water from MW-13 may not yield samples that are chemically representative of the AP property groundwater; an additional well will help define the areal extent and the nature of off-site contamination.

The Department believes its reasoning is sound and feels it is necessary to investigate further the off-site migration issue in order to complete the RI/FS work.

Please submit, within ten (10) days of receipt of this letter, for the Department's review a map indicating the proposed locations for two additional off-site wells and any others that you feel are justified to round out the study.

The Department wants to remind L.E. Carpenter that the Department expects timely responses to its dated comments and adequate notification of all field activities. Recently the Department received responses two and a half months late with an announcement that associated field work was scheduled for five days hence. The Amended ACO, signed September 26, 1986, II Project Coordination, paragraph 38 states:

"L.E. Carpenter shall notify NJDEP verbally at least two (2) weeks prior to commencement of any field related activities pursuant to this Administrative Consent Order by telephoning...during normal business hours (9:00 a.m. to 5:00 p.m.). A written notification shall follow within five (5) calendar days of the verbal notification."

Please abide by these instructions.

Should you have any questions, you may contact me at (609) 633-1455.

Sincerely,

A handwritten signature in cursive script, appearing to read "E. G. Kaup", with a long horizontal flourish extending to the right.

Edgar G. Kaup, P.E., Case Manager
Bureau of Federal Case Management

kj

c: G. Blyskun, BGWPA
D. Henderson, WSI
J. Prendergast, BEERA
J. Josephs, EPA